



February 17, 2010  
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**Annual 64.2009(e) CPNI Certification for 2009**  
**I.A.S. Film Corporation - Form 499 Filer ID 815584**

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification submitted on behalf of I.A.S. Film Corporation. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to I.A.S. Film Corporation

Attachments

cc: Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
E. Shuber, I.A.S.  
file: I.A.S. - CPNI  
tms: FCCx2010-1

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

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Annual 64.2009(e) CPNI Certification for:                      Calendar Year 2009

Date Filed:    February 17, 2010

Name of Company covered by this                                      I.A.S. Film Corporation  
certification:


Form 499 Filer ID:    815584

Name of Signatory:    Elizer Shuber

Title of Signatory:    President

I, Elizer Shuber, certify and state that:

1. I am President of I.A.S. Film Corporation and, and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Elizer Shuber, President  
I.A.S. Film Corporation

2/17/2010  
\_\_\_\_\_  
Date

Attachments:    Accompanying Statement explaining CPNI procedures – Attachment A  
                         Explanation of actions taken against data brokers – not applicable  
                         Summary of customer complaints – not applicable

Attachment A  
Statement of CPNI Procedures and Compliance

**IAS Film, Inc.**

Calendar Year 2009

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

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IAS Film, Inc.

Statement of CPNI Procedures and Compliance

IAS Film, Inc. ("Company") operates solely as a provider of prepaid debit card services. As such, the Company does not have any subscribed relationship with its customers and does not have any identifying information regarding its customers. Because the company's services are provided outside of any subscribed service relationship and the company does not obtain any information relating to the quantity, technical configuration, type, usage or location of the customer's service and does not even have the customer's billing name and address.

IAS Film, Inc. does not obtain, or retain CPNI, and therefore cannot use or permit access to CPNI for marketing purposes. IAS Film, Inc.'s marketing efforts are mass advertising and point of sale related and do not include the use of CPNI. Should IAS Film, Inc. expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

However, the Company does maintain prepaid debit card call detail records. The Company does not disclose call record information over the telephone, or in person, and does not provide for customer on-line access to card or call information. Password and other customer authentication processes are not applicable in this environment.

Company Customer Service Representatives do not have access to call detail information. The Company ensures that all access to call detail information is safeguarded from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to this information. The Company ensures that all access to call detail records be approved by the Company President and has instituted restrictions regarding the use and disclosure of, and access to, such records.

**IAS Film, Inc.**

Statement of CPNI Procedures and Compliance  
(Page 2)

Call detail information is only provided to government agencies or law enforcement, in writing, as a result of a subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and should such an event occur, will record all breaches discovered and notifications made to the United States Secret Service and the FBI. Attempts will be made, to the extent the Company has such information, to customers.

Because IAS Film, Inc. does not have CPNI, it has not taken any actions against data brokers in the last year.

Because IAS Film, Inc. does not have CPNI, it did not receive any customer complaints about the unauthorized release of CPNI in calendar year 2009.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.